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25 SEP 2000

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, IL 60604-3590

DOE-1031-00

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, OH 45402-2911

Dear Mr. Saric and Mr. Schneider:

REQUEST TO MODIFY THE OPERATIONS AND MAINTENANCE MASTER PLAN FOR THE AQUIFER RESTORATION AND WASTEWATER PROJECT

This letter serves to formally request the subject modification as discussed in the September 12 and 19 weekly site update conference calls.

Table 5-1 of the Operations and Maintenance Master Plan (OMMP) "Well Field Operational Objectives" will be revised. The objective to "minimize migration of the on-property portion of the plume to off-property areas" will be achieved by limiting the actions required to "balance pumping between the South Field Extraction and South Plume Modules such that the stagnation zone between the two modules is at or south of Willey Road," rather than shutting down the re-injection wells.

As presented in Table 5-1 of the OMMP, operation of South Plume Recovery Wells 6 and 7 is currently linked to the operation of the re-injection wells at a rate of 600 gpm or more. If re-injection drops below 800 gpm, pumping in Wells 6 and 7 is shut down. This linkage was based on the understanding that re-injection along the fence line had a strong influence on establishing a hydraulic barrier that would minimize the migration of the on-property plume to off-property areas. Without re-injection along Willey Road, it was thought that pumping in South Plume Wells 6 and 7 would pull the on-property plume to off-property areas.

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As reported in the Re-Injection Demonstration Test Report issued last May, re-injection during the demonstration did not play a large role in establishing a hydraulic barrier along Willey Road. This conclusion is supported by the low water level rises that were recorded next to the re-injection wells during the demonstration. The benefit realized by re-injection was through increased flushing, not hydraulic control. Without re-injection, it will take longer to remediate the plume, but migration of the on-property plume to off-property areas will not be severely impacted. This is because hydraulic control is more dependent on pumping in the South Field and South Plume Modules than it is on re-injection along Willey Road.

If you have any questions concerning this request, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny Reising

FEMP:R.J. Janke

Johnny W. Reising
Fernald Remedial Action
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